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17 *Solar Trust of America, LLC, Solar Millennium, Inc.,*
18 *CA I-10 Solar, LLC, Palo Verde Solar I, LLC,*
19 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
20 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
21 *Blythe Solar Power Project Unit 3, LLC and*
22 *Blythe Solar Power Project Unit 4, LLC*

23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 MMR GROUP, INC.,
27 MMR POWER SOLUTIONS, LLC and
28 SOUTHWESTERN POWER GROUP II, LLC,
Plaintiffs,

vs.

23 STA DEVELOPMENT, LLC (F/K/A SOLAR
24 MILLENNIUM, LLC), SOLAR TRUST OF
25 AMERICA, LLC, SOLAR MILLENNIUM AG,
26 SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC,
27 PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR
28 II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1,
LLC, BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC
AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC
Defendants.

Case No. 3:11-cv-01521-EMC

**ELEVENTH STIPULATION
TO EXTEND DEFENDANTS'
TIME TO RESPOND TO
AMENDED COMPLAINT
AND [PROPOSED] ORDER**

**The Honorable Judge
Edward M. Chen**

1 Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
2 SOUTHWESTERN POWER GROUP II, LLC (collectively, "MMR") and Defendants STA
3 DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
4 CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
5 BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
6 UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
7 POWER PROJECT UNIT 4, LLC (collectively, the "STAD Defendants") respectfully request
8 that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
9 filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
10 by two weeks from March 6, 2012 to March 13, 2012.
11

12 On November 4th and 14th, the parties requested, and this Court later granted, a one-week
13 extension of time for the STAD Defendants to respond to the Amended Complaint because the
14 parties were in advanced stages of settlement discussions. On November 22nd, December 1st, and
15 December 27th, January 10th, January 20th, February 3rd, and February 21st, the parties requested,
16 and this Court later granted, extensions of two weeks due to continued progress in settlement
17 negotiations. The parties continue to be hopeful that they will execute a settlement agreement
18 forthwith. Due to the continued progress in reaching a settlement, the parties request a one-week
19 extension of the time for the STAD Defendants to respond to the Amended Complaint. The
20 parties' request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial
21 economy, the parties therefore request that the Court extend the STAD Defendants' time to
22 respond to the Amended Complaint by two weeks from March 6, 2012 to March 13, 2012.
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1 Dated: March 5, 2012

MILBANK, TWEED, HADLEY & McCLOY LLP

2 By: /s/

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18 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
19 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
20 *Blythe Solar Power Project Unit 3, LLC and Blythe Solar*
21 *Power Project Unit 4, LLC*

22 Dated: March 5, 2012

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Solutions, LLC and Southwestern Power Group II, LLC

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: 3/6/12

